



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
March 7, 2012

Certified Mail No.70110110000190667978
Return Receipt Requested

Warning Letter

Mr. Max Faeth
President
Highland Plating Company
1001 No. Orange Drive
Los Angeles, CA 90038

Dear Mr. Faeth:

On October 7, 2011 a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA") at Highland Plating Company (Highland) with EPA Identification Number CAD008292153. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. § 6927(a)}.

A copy of the inspection report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies potential violations of the State of California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with any other applicable regulation.

Pursuant to Section 3008 of RCRA {42 U.S.C. § 6928}, Highland is required to correct the identified areas of noncompliance and to submit documentation of their correction to EPA:

1. Highland must submit a written standard operating procedure to ensure that weekly inspections of all 90-day hazardous waste storage areas are being thoroughly conducted and logged to prevent hazardous waste containers from being overlooked.
2. Highland must submit a written standard operating procedure to ensure that facility personnel put dirty rags and paint debris in the step and ensure that the funnel to the waste acetone container remains closed except when adding or removing waste.

3. Subsequent to the October 23, 2009 inspection, Highland submitted a written standard operating procedure for managing used lamps generated at the facility and certified that facility personnel with universal waste duties received training on how to properly manage the lamps. Highland must provide evidence that facility personnel with universal waste duties have been trained/re-trained and that Highland will ensure that the standards operating procedures are being consistently followed.

Documentation of your return to compliance may consist of, among other things, photographs, manifests, and revised records. Where compliance cannot be achieved within 30 calendar days, you must provide to EPA the reasons for the delay, a description of each corrective action planned, and a schedule on which each corrective action will be taken.

By copy of this letter, EPA is also providing the State of California with notice of the referenced violations of the California hazardous waste program. The State of California may notify the EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R. § 2.203(a)(2), EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

Your certification of correction of the identified areas of noncompliance must include a letter signed by a duly authorized official of your facility. Your response to the Warning Letter and Request for Information is due within 30 calendar days of your receipt of this letter. Your response shall be addressed to:

Jennifer Downey
Mailcode: WST-3
RCRA Enforcement Office
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

In lieu of submitting your response by mail, you may submit the response as portable document files via electronic mail to downey.jennifer@epa.gov.

If you have questions related to the inspection report or this letter, please contact Jennifer Downey of my staff at (213) 244- 1816.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy C. Miller', with a stylized flourish at the end.

Amy C. Miller, Manager
RCRA Enforcement Office

Enclosure:

cc (w/o enclosure):

Kristine Green, DTSC (kgreen@dtsc.ca.gov)